

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually And On Behalf Of All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,

Defendants.

This Document Relates To:

ALL RELATED ACTIONS.

Case No.: C-04-10294 -DPW

Class Action

DECLARATION OF JOSEPH M. BARTON IN SUPPORT OF MOTION OF BPI GLOBAL ASSET MANAGEMENT LLP TO BE APPOINTED AS LEAD PLAINTIFF AND FOR ITS COUNSEL TO BE APPOINTED AS LEAD COUNSEL

I, Joseph M. Barton, declare:

- I am an attorney at law at Gold Bennett Cera & Sidener LLP, counsel for Movant and proposed Lead Plaintiff BPI Global Asset Management LLP. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.
- Attached hereto as Exhibit A is a true and correct copy BPI Global Asset
 Management LLP's Certificate of Plaintiff.
- 3. Attached hereto as Exhibit B is a true and correct copy of the first notice filed in this action advising members of the proposed plaintiff class of the pendency of the action. The notice was distributed over the Internet on February 12, 2004 by PR Newswire. The notice advised members of the proposed class of their right to move the Court to serve as lead plaintiff no later than 60 days after publication of the notice.
- 4. Attached hereto as Exhibit C is a true and correct copy of the firm resume for Gold Bennett Cera & Sidener LLP.
- 5. Attached hereto as Exhibit D is a true and correct copy of the opinion In re

 Rent-Way Sec. Litig., 2003 U.S. Dist. LEXIS 25091 (W.D. Pa. December 22, 2003).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9th day of April 2004 at San Francisco, California.

Joseph M. Barton

CERTIFICATE OF SERVICE

I HERBY CERTIFY THAT A TRUE COPY OF THE ABOVE DOCUMENT WAS SERVED UPON THE ATTORNEYS OF RECORD FOR EACH OTHER, PARTY ,

RECORD FOR EACH OTHER PARTY BY MAIL(BY HAND),ON <u>4</u>/9/2//